

## Environmental Assessment Checklist

**Project Name: Helena North Hills Project – Capital 360 Project**

**Proposed Implementation Date: 2021-2022**

**Proponent: Montana DNRC**

**County: Lewis & Clark County**

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### Type and Purpose of Action

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#### Description of Proposed Action:

The proposed action is to implement a fuels reduction project on up to 80 acres of Trust Lands belonging to the Common Schools Trust. The objectives are to reduce wildland fire fuel loading near private property, reduce overstocked stands of primarily ponderosa pine, increase growth rates of remaining trees, increase resiliency to insect and disease outbreaks and to improve range conditions.

Fire suppression efforts, insect and disease proliferation and forest fuel build-up over the past century has led to hazardous fuel conditions in Montana's forests. Increased development in the wildland urban interface (WUI) coupled with large fuel loadings has increased the risk of wildfire to communities, homes, the public and firefighters.

This area is also characterized by having an extended fire season (March-October). In 2019 the North Hills Fire burned 4,100 acres in this area, including some of the Trust Lands adjacent to this proposed project area.

The proposed action on Trust Land includes hazardous fuels reduction treatments that are in Lewis and Clark County, approximately 12 miles north of Helena, Montana. The treatments being proposed are on parcels located in Township 12N Range 3W Section 36 (see Appendix A: Vicinity Map A-1 and Project Map A-2).

Thinning, tree pruning, mechanical chipping and slash piling for burning are the proposed management treatments that would be used to remove hazardous fuels in the project area.

Proposed Action would thin trees to an average spacing of 20 feet. This action would break up fuel continuity and reduce fuel loading, thereby reducing potential fire severity. Tree stem spacing would vary so that the best trees are retained. Trees selected to remain would have straight stems, small branch diameter, good crown coloration, good crown form, good crown ratios (>50%), be free from insects, diseases, physical and mechanical damages. All trees above 7 inches in diameter (measured 4.5 feet up the stem from the uphill side) would be retained. All existing woody debris greater than 8 inches would be retained and scattered to reduce soil impacts.

The Forestry Division of the Montana Department of Natural Resources and Conservation (DNRC) in partnership with the United States Forest Service State and Private Forestry

(USFS) offers financial assistance to reduce wildfire risk, improve the health and resiliency of forest ecosystems. These funds are offered through the Western States Wildland Urban Interface Grant Program (State Fire Assistance Program, CFA of 1978), referenced hereafter as the Grant Program.

The proposed projects would begin implementation summer of 2021 and conclude by December 2023.

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## **Project Development**

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### **SCOPING:**

- **PUBLIC SCOPED**  
Between February 12, 2021 through March 15, 2021, a scoping notice was posted on the DNRC Public Information Website: <http://dnrc.mt.gov/public-interest/public-notice>, identifying the proposal of reducing hazardous fuels on 80 acres of Trust Lands. Emails and letters were also sent out to people who request public scoping notices. This list is maintained by the DNRC Trust Lands Forest Management Bureau.
- **AGENCIES SCOPED**
  - A scoping notice was also sent to Montana Department of Fish, Wildlife and Parks
- **COMMENTS RECEIVED**
  - Public Scoping of the Helena North Hills – Capital 360 Project resulted in written comments from one individual.
  - The one individual said that the Northern Cheyenne is interested in the project and asked if a Class I or III report will be involved with this project.
  - This question/comment was determined to be applicable and within the scope of this Environmental Assessment and is included in the assessment completed for this document (ARCHAEOLOGICAL SITES / AESTHETICS / DEMANDS ON ENVIRONMENTAL RESOURCES section page 11).

DNRC specialists were consulted, including Devin Healy, Patrick Rennie and Cody Nelson.

Internal and external issues, concerns and recommendations were incorporated into project planning and design and will be implemented in associated contracts.

### **OTHER GOVERNMENTAL AGENCIES WITH JURISDICTION, LIST OF PERMITS NEEDED:**

Allocations of State Fire Assistance (now known as National Fire Capacity) Program Funding, including the Western States Wildland Urban Interface Grant Program, do not require environmental assessment under the National Environmental Policy Act (NEPA) because the funding is provided under the Cooperative Forestry Assistance Act of 1978, which is exempt from NEPA review as described in the scope of Executive Order 12372. This order allows certain states processes to exclude Federal programs from NEPA review and comment and use

the State's own measures of review. Therefore, allocations of State Forestry Assistance funding are reviewed under the Montana Environmental Policy Act (MEPA), not NEPA.

All work performed under the Grant Program must fully comply with all applicable federal, state, and local laws, rules and regulations. Applicable rules & regulation include but are not limited to:

- Lewis and Clark County Burn Permit
- Montana Environmental Policy Act

### **ALTERNATIVES CONSIDERED:**

No-Action Alternative Under the No-Action Alternative, DNRC would not reduce hazardous fuels on, up to 80 acres of Trust Lands, paid for by the Grant Program.

Action Alternative Under the Action Alternative, DNRC would reduce hazardous fuels on, up to 80 acres of Trust Lands, paid for by the Grant Program.

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## **Impacts on the Physical Environment**

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### **VEGETATION:**

No-Action Alternative: DNRC would not reduce hazardous fuels on, up to 80 acres of Trust Lands, paid for by the Grant Program. No direct, indirect, or cumulative impacts would be expected.

Action Alternative: DNRC would reduce hazardous fuels on, up to 80 acres of Trust Lands, paid for by the Grant Program. DNRC would hire a contractor to do a portion of the work and DNRC employees would do a portion of the hazardous fuels reduction work. All mountain pine beetle killed trees, except for those dead trees retained for wildlife habitat, will be cut and chipped or hand piled on site for burn disposal. Densely forested areas containing thickets of live seedlings, sapling and pole sized trees will be thinned to provide a distance between retained boles, approximately equivalent to the diameter of the retain trees plus ten feet. Areas disturbed during the burn disposal process would be raked and seeded to discourage noxious weed growth. Temporary disturbances to plant communities may occur. These vegetative communities would not be permanently altered. No lasting impacts to rare plants or cover types are anticipated within the project area.

### **Existing Conditions**

Forested areas within the respective project area consist of densely stocked stands of small diameter regenerating ponderosa pine and Douglas-fir trees interspersed with stands of larger, mature ponderosa pine and scattered larger diameter Douglas-fir. The stand has had mountain pine beetle activity in the past decade resulting in some large ponderosa pine mortality.

The Montana Natural Heritage Program lists 1 plant species of concern, 0 potential species of concern, and 0 special status species within T12N R3W Section 36. The plant species of concern is *Astragalus convallarius* (Lesser Rushy Milkvetch).

**Effects of Action Alternative**

The anticipated impacts of the no-action and action alternatives on vegetation disturbance are summarized in the following table:

Vegetation	Impact												Can Impact Be Mitigated?	Comment Number
	Direct				Secondary				Cumulative					
	No	Low	Mod	High	No	Low	Mod	High	No	Low	Mod	High		
<b><i>No-Action</i></b>														
Noxious Weeds	X				X				X					
Rare Plants	X				X				X					
Vegetation Communities	X				X				X					
Old Growth	X				X				X					
<b><i>Action</i></b>														
Noxious Weeds		X				X				X			yes	1,2,3
Rare Plants		X				X				X			yes	4
Vegetation Communities		X				X				X			yes	1,2,3,4
Old Growth	X				X				X					

***Vegetation Mitigations***

1. The project area would be monitored for noxious weeds after fuel reduction operations are complete and herbicide treatments may be applied if needed.
2. All equipment used for fuels reduction and herbicide treatments would be washed and inspected prior to start of work.
3. All new burn piles should be lightly scarified with a hand rake and reseeded to site adapted grass to reduce the threat of noxious weed spread.
4. If any species of concern plants are found during this project period, then thinning efforts should be diverted from those locations and further reviewed by DNRC.

**SOIL DISTURBANCE AND PRODUCTIVITY:**

No-Action Alternative: DNRC would not reduce hazardous fuels on, up to 80 acres of Trust Lands, paid for by the Grant Program. No direct, indirect, or cumulative impacts would be expected.

Action Alternative: DNRC would reduce hazardous fuels on, up to 80 acres of Trust Lands, paid for by the Grant Program. DNRC would fully comply with all applicable federal, state, and local laws, rules, and regulations on all work performed. Therefore, minor direct, indirect, or cumulative impacts would be expected.

### **Existing Conditions**

Soils within the project area are primarily Tolex-Holter-Castner channery loam. This soil type is a well-drained soil. Colluvium derived from argillite. Residuum weathered from argillite and/or residuum weathered from igneous rock.

### **Effects of the Proposed Alternatives**

The anticipated impacts of the no-action and action alternatives on soil disturbance and productivity are summarized in the following table:

Soil Disturbance and Productivity	Impact												Can Impact Be Mitigated?	Comment Number
	Direct				Secondary				Cumulative					
	No	Low	Mod	High	No	Low	Mod	High	No	Low	Mod	High		
<b>No-Action</b>														
Physical Disturbance (Compaction and Displacement)	X				X				X					
Erosion	X				X				X					
Nutrient Cycling	X				X				X					
Slope Stability	X				X				X					
Soil Productivity	X				X				X					
<b>Action</b>														
Physical Disturbance (Compaction and Displacement)		X				X				X			yes	1,2
Erosion		X				X				X			yes	1,2
Nutrient Cycling		X				X				X			yes	3
Slope Stability		X				X				X			yes	1,2
Soil Productivity		X				X				X			yes	3

### ***Soil Mitigations***

1. All proposed activities would implement Forestry Best Management Practices and rules under the SFLMP. This includes leaving coarse woody debris (greater than 8" in diameter) under the SFLMP. This includes leaving coarse woody debris (greater than 8" in diameter) grass seed disturbed sites. The main impact to soils will be accumulated slash piles once they are burned. Specific mitigations to burned slash piles will include raking seeding and strategically placing coarse woody debris, including scattering large fuel concentrations.
2. Operation of mechanized equipment would be limited to dry or frozen soil conditions to minimize the potential impacts to soil and subsequent risks of erosion.
3. Nutrient cycling and soil productivity would be maintained by leaving coarse and fine woody material on site after thinning and slash disposal.

### **WATER QUALITY AND QUANTITY:**

**No-Action Alternative:** DNRC would not reduce hazardous fuels on, up to 80 acres of Trust Lands, paid for by the Grant Program. No direct, indirect, or cumulative impacts would be expected.

Action Alternative: DNRC would reduce hazardous fuels on, up to 80 acres of Trust Lands, paid for by the Grant Program. DNRC would fully comply with all applicable federal, state, and local laws, rules, and regulations, section 508 of the Clean Water Act. Therefore, minor direct, indirect, or cumulative impacts would be expected.

**Water Quality and Quantity Existing Conditions**

The project area is entirely inside the Upper Missouri Sub Basin (HUC 10030101). The project area contains dry ephemeral drainages with no defined stream channels.

**Effects of the Proposed Alternatives**

The anticipated impacts of the no-action and action alternatives on water quality and quantity are summarized in the following table:

Water Quality & Quantity	Impact												Can Impact Be Mitigated?	Comment Number
	Direct				Secondary				Cumulative					
	No	Low	Mod	High	No	Low	Mod	High	No	Low	Mod	High		
No-Action														
Water Quality	X				X				X					
Water Quantity	X				X				X					
Action														
Water Quality		X				X				X			yes	1,2 & 3
Water Quantity		X				X				X			yes	1,2

*Water Quality & Quantity Mitigations:*

1. All proposed activities would implement Forestry Best Management Practices.
2. Operation of mechanized equipment would be limited to dry or frozen soil conditions to minimize impacts to soil and subsequent risks of erosion and sediment delivery.
3. The removal of vegetation will increase the level of soil moisture availability.

**FISHERIES:**

No-Action Alternative: DNRC would not reduce hazardous fuels on, up to 80 acres of Trust Lands, paid for by the Grant Program. No direct, indirect, or cumulative impacts are anticipated to occur.

Action Alternative: DNRC would reduce hazardous fuels on, up to 80 acres of Trust Lands, paid for by the Grant Program. DNRC would fully comply with all applicable federal, state, and local laws, rules, and regulations. No direct, indirect, or cumulative impacts are anticipated to occur.

**Fisheries Existing Conditions**

The project area is entirely inside the Upper Missouri Sub Basin (HUC 10030101). The project area contains dry ephemeral drainages with no defined stream channels. There is no surface water in the project area. The nearest surface water, Holter Lake is approximately 1.3 miles to the east.

### **Effects of the Proposed Alternatives**

The anticipated impacts of the no-action and action alternatives on fisheries are summarized in the following table:

Fisheries	Impact												Can Impact Be Mitigated?	Comment Number
	Direct				Secondary				Cumulative					
	No	Low	Mod	High	No	Low	Mod	High	No	Low	Mod	High		
<b>No-Action</b>														
Sediment	X													
Flow Regimes	X													
Woody Debris	X													
Stream Shading	X													
Stream Temperature	X													
Connectivity	X													
Populations	X													
<b>Action</b>														
Sediment	X													1
Flow Regimes	X													
Woody Debris	X													
Stream Shading	X													
Stream Temperature	X													
Connectivity	X													
Populations	X													

#### *Fisheries Mitigations:*

Same as those specified under Soil and Water Resource Sections.

1.No new road construction would occur.

### **WILDLIFE:**

No-Action Alternative: DNRC would not reduce hazardous fuels on, up to 80 acres of Trust Lands, paid for by the Grant Program. No direct, indirect, or cumulative effects to wildlife would be anticipated.

Action Alternative: DNRC would reduce hazardous fuels on, up to 80 acres of Trust Lands, paid for by the Grant Program. The DNRC would fully comply with all applicable federal, state, and local laws, rules, and regulations. Wildlife displacement during forest fuel reduction activities would likely be short-term. No appreciable changes in long-term use of the project area by any species would be expected. Due to the size, nature, duration, and location of the project, adverse direct, indirect, or cumulative impacts are expected to be negligible.

The Montana Natural Heritage Program lists 15 animal species of concern, 0 potential species of concern, and 1 special status species within T12N R3W. The species of concern are MAMMALS: Townsend's Big-eared Bat; Black tailed Prairie Dog; Spotted Bat; Hoary Bat, Long-eared Myotis; Little Brown Myotis, Fringed Myotis; Grizzly Bear; BIRDS:

Golden Eagle, Great Blue Herron; Brown Creeper; Evening Grosbeak; Pileated Woodpecker; Peregrine Falcon; Clark’s Nutcracker. The special status species was the Bald Eagle.

**No-Action:** Under the no action alternative, none of the proposed vegetation treatments would occur. Thus, no direct, indirect or cumulative effects to habitat and associated wildlife species would be expected as a result of the proposed activities.

**Action-Alternative:**

The anticipated impacts of the no-action and action alternatives on wildlife are summarized in the following table:

Wildlife	Impact												Can Impact be Mitigated?	Comment Number
	Direct				Secondary				Cumulative					
	No	Low	Mod	High	No	Low	Mod	High	No	Low	Mod	High		
Threatened and Endangered Species														
Grizzly bear ( <i>Ursus arctos</i> ) Habitat: Recovery areas, security from human activity		X				X				X			Yes	1
Canada lynx ( <i>Felix lynx</i> ) Habitat: Subalpine fir habitat types, dense sapling, old forest, deep snow zone		X				X				X			Yes	2
Wolverine ( <i>Gulo gulo</i> )	X				X				X				NA	4
Sensitive Species														
Bald eagle ( <i>Haliaeetus leucocephalus</i> ) Habitat: Late-successional forest within 1 mile of open water		x				x				x			Yes	8
Black-backed woodpecker ( <i>Picoides arcticus</i> ) Habitat: Mature to old burned or beetle-infested forest	X				X				X				NA	4
Black-tailed prairie dog ( <i>Cynomys ludoviscianus</i> ) Habitat: grasslands, short-grass prairie,	X				X				X				NA	4



Wildlife	Impact												Can Impact be Mitigated?	Comment Number
	Direct				Secondary				Cumulative					
	No	Low	Mod	High	No	Low	Mod	High	No	Low	Mod	High		
sagebrush semi-desert														
<b>Flammulated owl</b> <i>(Otus flammeolus)</i> Habitat: Late-successional ponderosa pine and Douglas-fir forest		X				X				X			Yes	5
<b>Harlequin duck</b> <i>(Histrionicus histrionicus)</i> Habitat: White-water streams, boulder and cobble substrates	X				X				X				NA	4
<b>Northern bog lemming</b> <i>(Synaptomys borealis)</i> Habitat: Sphagnum meadows, bogs, fens with thick moss mats	X				X				X				NA	4
<b>Mountain plover</b> <i>(Charadrius montanus)</i> Habitat: short-grass prairie & prairie dog towns	X				X				X				NA	4
<b>Peregrine falcon</b> <i>(Falco peregrinus)</i> Habitat: Cliff features near open foraging areas and/or wetlands	x				x				x				NA	4
<b>Pileated woodpecker</b> <i>(Dryocopus pileatus)</i> Habitat: Late-successional ponderosa pine and larch-fir forest		X				X				X			Yes	6
<b>Greater Sage grouse</b> <i>(Centrocercus urophasianus)</i> Habitat: sagebrush semi-desert	X				X				X				NA	4

Wildlife	Impact												Can Impact be Mitigated?	Comment Number
	Direct				Secondary				Cumulative					
	No	Low	Mod	High	No	Low	Mod	High	No	Low	Mod	High		
Golden Eagle (Aquila chrysaetos)		X				X				X			Yes	15
Brown Creeper (Certhia americana)		X				X				X			Yes	16
Evening Grosbeak (Coccothraustes vespertinus)		X				X				X			Yes	17
Clark’s Nutcraker (Nucifraga columbiana)		X				X				X			Yes	18
Great Blue Heron (Ardea herodias)		X				X				X			Yes	19
Townsend’s big-eared bat (Plecotus townsendii) Habitat: Caves, caverns, old mines		X				X				X			Yes	9
Spotted Bat (Euderma maculatum)		X				X				X			Yes	10
Hoary Bat (Lasiurus cinereus)		X				X				X			Yes	11
Little Brown Myotis (Myotis lucifugus)		x				x				x			Yes	12
Long-eared Myotis (Myotis evotis)		X				X				X			Yes	13
Fringed Myotis (Myotis thysanodes)		X				X				X			Yes	14
Big Game Species														
Elk		X				X				X			NA	7
Whitetail		X				X				X			NA	7
Mule Deer		X				X				X			NA	7

**Comments:**

- The proposed project area lies approximately 16.5 miles east of the eastern boundary of the grizzly bear Northern Continental Divide Ecosystem as defined by Wittinger et al. (2002). Grizzly bears could possibly travel through the project area. The project area overall possesses relatively dry habitats with relatively low greenness values. Human access levels in this general area are high due to the presence of many private lands, developed sites and privately controlled access. Cover and habitat connectivity associated with riparian areas would not be appreciably altered as the project area does not contain riparian areas. During periods of fuel reduction activity, grizzly bears could be temporarily displaced by the disturbance if they happen to be in the local area. Thus, some short-term risk associated with disturbance, and some long-term, albeit minor risk, to grizzly bears could occur given the reduction in cover and the increased human

activity. Given the size and location of cover patches affected and removed, the scope and scale of the proposed activities, and relatively marginal inherent habitat quality for grizzly bears present in the project area, adverse direct, indirect and cumulative impacts to grizzly bears as a result of this project are expected to be low.

2. All habitat stands on the project area are relatively dry with relatively little browse or horizontal cover. The Montana Natural Heritage classifies the project area as being low suitability habitat for Canada lynx. Given that affected forest patches provide relatively low-quality habitat for snowshoe hares and lynx, that the acreage treated is relatively small, minor adverse direct, indirect, and cumulative effects to Canada lynx would be anticipated.
3. Suitable denning habitat for wolverines generally found at high elevations in alpine habitat types capable of holding heavy snow in late spring is not present on the project area. However, wolverines could occasionally use portions of the project area during daily movements and foraging activities during any season of the year and could be temporarily displaced by proposed logging activities. Thus, minor adverse direct, indirect, or cumulative effects to wolverines would be expected to occur, because of this project.
4. This project area is either out of the range of the normal distribution for this species or suitable habitat will not be manipulated under the proposed action. Thus, no direct, secondary, or cumulative effects would be anticipated.
5. Flammulated owl habitat is identified adjacent to the project area. The nearest transient point observation is approximately 5 miles east of the project area. Flammulated owls prefer open habitat conditions on south-facing slopes would likely be minimally affected by proposed fuel reduction activity. Some displacement of owls could occur during active operations if they are present in affected stands. At least two large snag and two large snag recruitment tree per acre should be retained to provide for potential nesting habitat structure. Given the limited amount of habitat that could be affected and the owl's preference for open stand conditions, minor adverse direct, indirect, and cumulative effects to flammulated owls would be anticipated.
6. Given the limited amount of pileated woodpecker habitat that could be affected and the low inherent quality of habitat that would be affected, minor adverse direct, indirect, and cumulative effects to pileated woodpeckers would be anticipated.
7. The project area provides suitable habitat for deer and elk and approximately Under the proposed action, up to 80 acres of forest would have tree density and associated crown cover reduced by fuel reduction, which could influence local use of the area by big game for 4 to 5 decades. Thus, some short-term risk associated with disturbance, and some long-term, albeit minor risk, to elk and deer could occur given the reduction in cover. Given the location, size and type of the proposed activity, and cover attributes found on the project area, low adverse direct, indirect, and cumulative effects to deer and elk associated with cover removal on these habitats would be anticipated.
8. Low suitability bald eagle transient habitat occurs in the project area. The nearest point observation lies 1.5 miles to the east of the project area. If evidence of a nest site is in the treatment units it should not be disturbed. Due to the temporary nature of the

- proposed action and the type of habitat present minor adverse direct, indirect, or cumulative effects to bald eagle would be expected to occur, because of this project.
9. It is unknown if Townsend's big-eared bats occur in the vicinity of the project area. The area is classified as moderate suitability for Townsend's big-eared bat. However, several large limestone outcrop features occur in the project area that could provide suitable roosting sites for a number of native bat species. Observations of Townsends big-eared bats were made 6 miles away from the project area (MNHP). Fuel reduction activity could disturb roosting bats on the project area during project activities, however, the features would not be altered in any way. Numerous large trees would also be retained as leave trees in the project area that could offer usable roost sites for forest-dwelling bat species. Given the small scope and limited duration of the project, any adverse direct, indirect or cumulative effects to native bats would be expected to be minor.
  10. It is unknown if spotted bats occur in of the project area. The area is classified as low suitability for the spotted bat. However, several large limestone outcrop features occur in the project area that could provide suitable roosting sites for a number of native bat species. An observation of spotted bat was made 2.5 miles south west from the project area (MNHP). Fuel reduction activity could disturb roosting bats on the project area during project activities, however, the features would not be altered in any way. Numerous large trees would also be retained as leave trees in the project area that could offer usable roost sites for forest-dwelling bat species. Roost habitats and sites have not been documented in Montana. Given the small scope and limited duration of the project, any adverse direct, indirect or cumulative effects to native bats would be expected to be minor.
  11. It is unknown if Hoary bats occur in the project area. The area is classified as moderate suitability for Hoary bats. However, several large limestone outcrop features occur in the project area that could provide suitable roosting sites for a number of native bat species. An observation of Hoary bat was made 2.5 miles away from the project area (MNHP). Fuel reduction activity could disturb roosting bats on the project area during project activities, however, the features would not be altered in any way. Numerous large trees would also be retained as leave trees in the project area that could offer usable roost sites for forest-dwelling bat species. Given the small scope and limited duration of the project, any adverse direct, indirect or cumulative effects to native bats would be expected to be minor.
  12. It is unknown if little brown myotis bats occur in the project area. The area is classified as moderate suitability for little brown myotis bats. However, several large limestone outcrop features occur in the project area that could provide suitable roosting sites for a number of native bat species. An observation of little brown myotis bat was made 2.5 miles away from the project area (MNHP). Fuel reduction activity could disturb roosting bats on the project area during project activities, however, the features would not be altered in any way. Numerous large trees would also be retained as leave trees in the project area that could offer usable roost sites for forest-dwelling bat species. Given the small scope and limited duration of the project, any adverse direct, indirect or cumulative effects to native bats would be expected to be minor.

13. It is unknown if long-eared myotis bats occur in the project area. The area is classified as moderate suitability for long-eared myotis bats. However, several large limestone outcrop features occur in the project area that could provide suitable roosting sites for a number of native bat species. An observation of long-eared myotis bat was made 5.8 miles away from the project area (MNHP). Fuel reduction activity could disturb roosting bats on the project area during project activities, however, the features would not be altered in any way. Numerous large trees would also be retained as leave trees in the project area that could offer usable roost sites for forest-dwelling bat species. Given the small scope and limited duration of the project, any adverse direct, indirect or cumulative effects to native bats would be expected to be minor.
14. It is unknown if fringed myotis bats occur in the project area. The area is classified as moderate suitability for fringed myotis bats. However, several large limestone outcrop features occur in the project area that could provide suitable roosting sites for a number of native bat species. An observation of fringed myotis bat was made 5.8 miles away from the project area (MNHP). Fuel reduction activity could disturb roosting bats on the project area during project activities, however, the features would not be altered in any way. Numerous large trees would also be retained as leave trees in the project area that could offer usable roost sites for forest-dwelling bat species. Given the small scope and limited duration of the project, any adverse direct, indirect or cumulative effects to native bats would be expected to be minor.
15. Low suitability golden eagle habitat occurs in the project area. The nearest point observation lies 1.3 miles to the east of the project area. If evidence of a nest site is in the treatment units it will not be disturbed. Due to the temporary nature of the proposed action and the type of habitat present minor adverse direct, indirect, or cumulative effects to golden eagle would be expected to occur, because of this project.
16. Low suitability brown creeper habitat occurs in the project area. The nearest point observation lies 2 miles to the north-east of the project area. Due to the temporary nature of the proposed action and the type of habitat present minor adverse direct, indirect, or cumulative effects to brown creeper would be expected to occur, because of this project.
17. Moderate suitability evening grosbeak habitat occurs in the project area. The nearest point observation lies 2.4 miles to the south of the project area. Due to the temporary nature of the proposed action and the type of habitat present minor adverse direct, indirect, or cumulative effects to evening grosbeak would be expected to occur, because of this project.
18. Moderate suitability Clark's Nutcracker habitat occurs in the project area. The nearest point observation lies 1.7 miles to the south-east of the project area. Due to the temporary nature of the proposed action and the type of habitat present minor adverse direct, indirect, or cumulative effects to Clark's Nutcracker would be expected to occur, because of this project.
19. Low suitability Great Blue Heron habitat occurs in the project area. The nearest point observation lies 3.6 miles to the south west of the project area in Lake Helena. Due to the absence of wetlands and riparian areas in the proposed project area, negligible

adverse direct, indirect, or cumulative effects to Great Blue Heron would be expected to occur, because of this project.

*Wildlife Mitigations:*

1. Slash generated from fuel reduction activities larger than eight inches diameter would be retained on the forest floor to maintain coarse woody debris in the treatment units.
2. Approximately two wildlife snags and two snag recruits per acre would be retained.

**AIR QUALITY:**

No-Action Alternative: DNRC would not reduce hazardous fuels on, up to 80 acres of Trust Lands, paid for by the Grant Program. No direct, indirect, or cumulative effects to air quality would be anticipated.

Action Alternative: DNRC would reduce hazardous fuels on, up to 80 acres of Trust Lands, paid for by the Grant Program. DNRC would fully comply with all applicable federal, state, and local laws, rules, and regulations, and section 306 of the Clean Air Act on all work performed. Slash piles would be constructed during thinning and later burned. Burning would be done only during conditions that are conducive to good smoke dispersion. Actual burning days would be controlled and monitored by the Montana Department of Environmental Quality and the smoke monitoring unit of the Montana/Idaho Airshed Group and would meet US Environmental Protection Agency standards. This would further minimize the direct and indirect effects of burning activities. Minor direct, indirect, or cumulative impacts would be expected.

**Effects of the Proposed Alternatives**

The anticipated impacts of the no-action and action alternatives on air-quality are summarized in the following table:

Air Quality	Impact												Can Impact Be Mitigated?	Comment Number
	Direct				Secondary				Cumulative					
	No	Low	Mod	High	No	Low	Mod	High	No	Low	Mod	High		
<b>No-Action</b>														
Smoke	x				x				x				N/A	
Dust	x				x				x				N/A	
<b>Action</b>														
Smoke		x				x				x			Yes	1
Dust	x				x				x					

*Air Quality Mitigations:*

1. Burning within the project area would be short in duration and should be conducted when conditions favor good to excellent ventilation and smoke dispersion as determined by the Montana Department of Environmental Quality. By retaining scattered larger diameter log on the landscape, it will allow the piles burn out more quickly, thus limiting the duration of the burns.

## ARCHAEOLOGICAL SITES / AESTHETICS / DEMANDS ON ENVIRONMENTAL RESOURCES:

No effects to historical or archaeological sites would be expected under either alternative.

No-Action Alternative: DNRC would not reduce hazardous fuels on, up to 80 acres of Trust Lands, paid for by the Grant Program. No direct, indirect, or cumulative effects aesthetics would be anticipated.

Action Alternative: DNRC would reduce hazardous fuels on, up to 80 acres of Trust Lands, paid for by the Grant Program. The contribution of visible fuel reduction treated acres should be minor in comparison to what exists currently throughout the landscape. Due to similar treatments already completed on adjacent land, this area would likely continue to experience similar forms, lines, textures, and colors. Therefore, minor direct, indirect, or cumulative aesthetics impacts would be expected.

No effects to the demands on environmental resources of land, water, air, or energy would be expected under either alternative.

### Effects of the Proposed Alternatives

The anticipated impacts of the no-action and action alternatives on archaeological sites / aesthetics / demands on the environmental resources are summarized in the following table:

Will Alternative result in potential impacts to:	Impact												Can Impact Be Mitigated?	Comment Number
	Direct				Secondary				Cumulative					
	No	Low	Mod	High	No	Low	Mod	High	No	Low	Mod	High		
No-Action														
Historical or Archaeological Sites	X				X				X					
Aesthetics	X				X				X					
Demands on Environmental Resources of Land, Water, or Energy	X				X				X					
Action														
Historical or Archaeological Sites		X				X				X			Yes	1
Aesthetics		X				X				X			Yes	2
Demands on Environmental Resources of Land, Water, or Energy	X				X				X					

#### Comments:

1. A Class I review was conducted by the DNRC staff archaeologist for the areas of potential effect (APE) on state land. This entailed inspection of project maps, geologic maps, the DNRC's TLMS database, and General Land Office Survey Plats. The Class I search revealed that one previous Class III cultural resource inventory was conducted in or near a portion of the APE but no cultural or paleontologic resources were identified. In general, the terrain within the APE is comparatively steep (20+ percent slopes). Additionally, there are a lack of springs and a lack of geology that

would suggest caves, rock shelters, or sources of tool stone. Because neither cultural nor paleontologic resource density is expected to be high in the APE, no additional archaeological investigative work will be conducted. Considering the low-impact nature of the proposed fuels reduction project, the proposed action has little potential to physically or visually impact any kind of cultural or paleontologic resource should they exist in the APE.

*Mitigations:*

2. All new burn piles should be lightly scarified with a hand rake and reseeded to site adapted grass to reduce the threat of noxious weed spread.

## **OTHER ENVIRONMENTAL DOCUMENTS PERTINENT TO THE AREA:**

- Tri-County Community Wildfire Protection Plan, (CWPP). This project aligns with the Tri-County CWPP mitigation goals by focusing resources on high priority areas and using vegetation management to eliminate hazardous fuels in forested area.

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## **Impacts on the Human Population**

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Forests are dynamic, and the current conditions are departed from the historic, fire-dependent conditions which would have occupied this site. The project area is currently comprised of over-crowded trees with contiguous, closed canopy stand and surface-to-crown fuels; leaving this forest susceptible to stand replacing high-intensity, high-severity wildfire behavior. The intent is to reduce the risk of high-intensity, high-severity wildfire which may impact landowners and adjacent communities (loss of forest structure and function from stand-replacing wildfire, high-output of embers from crown fire behavior and increase erosion from a severe wildfire event. Implementing fuels reduction treatment in this area supports jobs in the forestry sector and increases awareness to the public about forestry treatments and wildfire preparedness; increase public and firefighter safety from wildfires; increase forest health and resiliency; connects to completed fuels reduction projects that further supports the items previously mentioned in this paragraph.

To ensure the health and safety of the public are top priority DNRC would comply with all applicable federal, state, and local laws, rules, and regulations, and section 306 of the Clean Air Act on all work performed. Slash piles would be constructed during thinning and later burned. Burning should occur during conditions that are conducive to good smoke dispersion. Actual burning days would be controlled and monitored by the Montana Department of Environmental Quality (DEQ) and the smoke monitoring unit of the Montana/Idaho Airshed Group and would meet US Environmental Protection Agency standards. This would further minimize the direct and indirect effects of burning activities. Minor direct, indirect, or cumulative impacts would be expected.

No-Action Alternative: DNRC would not reduce hazardous fuels on, up to 80 acres of Trust Lands, paid for by the Grant Program. No direct, indirect, or cumulative effects aesthetics would be anticipated. The historically fire dependent and currently over-crowded and departed forest conditions would remain at risk to potential impacts of high-intensity, high-severity wildfire.

Action Alternative: DNRC would reduce hazardous fuels on, up to 80 acres of Trust Lands, paid for by the Grant Program. This work will reduce the risk of uncharacteristic wildfire; support



forestry jobs; inform the public about local, state and federal government partnerships and grant programs; and bring money into the community to support the local economy. Proposed forest management activities will reduce the amount and availability of hazardous fuels, which has the greatest potential to reduce the intensity and severity of wildfire behavior in the proposed project area.

**Effects of the Proposed Alternatives**

The anticipated impacts of the no-action and action alternatives on human populations are summarized in the following table:

Will Alternative result in potential impacts to:	Impact												Can Impact Be Mitigated?	Comment Number
	Direct				Secondary				Cumulative					
	No	Low	Mod	High	No	Low	Mod	High	No	Low	Mod	High		
<b>No-Action</b>														
Health and Human Safety	X				X				X					
Industrial, Commercial and Agricultural Activities and Production	X				X				X					
Quantity and Distribution of Employment	X				X				X					
Local Tax Base and Tax Revenues	X				X				X					
Demand for Government Services	X				X				X					
Access to and Quality of Recreational and Wilderness Activities	X				X				X					
Density and Distribution of population and housing	X				X				X					
Social Structures and Mores	X				X				X					
Cultural Uniqueness and Diversity	X				X				X					
<b>Action</b>														
Health and Human Safety		X				X				X			yes	1,2
Industrial, Commercial and Agricultural Activities and Production	X				X				X				no	
Quantity and Distribution of Employment		X				X				X			no	
Local Tax Base and Tax Revenues	X				X				X				no	
Demand for Government Services	X				X				X				no	

Will Alternative result in potential impacts to:	Impact												Can Impact Be Mitigated?	Comment Number
	Direct				Secondary				Cumulative					
	No	Low	Mod	High	No	Low	Mod	High	No	Low	Mod	High		
Access to and Quality of Recreational and Wilderness Activities	X				X				X				no	
Density and Distribution of population and housing	X				X				X				no	
Social Structures and Mores	X				X				X				no	
Cultural Uniqueness and Diversity	X				X				X				no	

**Mitigations:**

1. In the event of a wildfire, the no-action alternative retains the potential impact of increased risk to loss of forest structure, increased risk to the adjacent community and residents and decreased safety to firefighters. The action alternative seeks to mitigate these risks by thinning over-crowded stands, reducing the contiguous overstory canopy and removing ladder fuels to disrupt the potential of a surface fire becoming a crown fire, critical objectives for forests in and near the Wildland Urban Interface.
2. Smoke generated from the pile burning of forest slash may have effects on human health that can be negatively impactful, especially to vulnerable populations with underlying health conditions, or older adults and children. Added to these potential effects is the public health concerns surrounding Covid-19. Burning within the project area would be short in duration and would be conducted when conditions favor good to excellent ventilation and smoke dispersion as regulated and authorized by the Montana Department of Environmental Quality and section 306 of the Clean Air Act.

**Locally Adopted Environmental Plans and Goals:**

The following plan identify and supports fuels reduction work in this area:

- Montana Forest Action Plan, 2020 – Priority area for wildfire risk.
- Tri-County Community Wildfire Protection Plan, 2020 – Identifies fuels reduction projects in the wildland urban interface as a priority due to the threat of severe fire.

**Other Appropriate Social and Economic Circumstances:**

- None that are applicable

**Environmental Assessment Checklist Prepared By:**

**Name:** Crystal Beckman  
**Title:** DNRC Forestry Assistance Specialist  
**Date:** June 18, 2021

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## Finding

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### Alternative Selected

DNRC has completed the environmental assessment (EA) for the proposed project of DNRC reducing hazardous fuels on, up to 80 acres of Trust Lands, in Lewis and Clark County, paid for by the Grant Program. DNRC would reduce fuels through a combination of contractual work and DNRC employees conducting mechanical and hand thinning of non-commercial trees, hand-piling and burning of slash and or mechanical chipping.

Montana state law (MCA 76-13-701,702; MCA 76-13-136; MCA 77-5-401,402,403) supports the sustainable management of public forests to conserve and protect ecological and economic benefits they provide to Montana. This includes improving forest health, reducing wildfire risk within and adjacent to the wildland urban interface and promoting protection for, and the benefits of privately owned forestland.

Additionally, authority for the Grant Program is a directive governed by the Cooperative Forestry Assistance Act of 1978. An act by the U.S. Congress to sustain, enhance, and protect the intrinsic benefits of non-federal forests. Funding for this project is awarded to support the sustainable management of these forests; addressing the reduction of hazardous fuel conditions in the wildland urban interface and to result in establishing fire adapted communities, providing safe and effective wildfire response, and promoting wildfire resilient landscapes. Criteria and guidance for the Grant Program is established by the Council of Western States Foresters, Western States Fire Managers sub-committee. DNRC ensures projects are compliant with eligibility criteria, as well as state and federal authorities.

The alternatives proposed for consideration in the EA were the No-Action Alternative and the Action Alternative. Under the Action Alternative, DNRC would reduce hazardous fuels on, up to 80 acres of Trust Lands.

After a thorough review of the EA, the project file, Department policies, standards, and guidelines, I have made the following decision concerning this proposal:

The Action Alternative has been selected for the following reasons:

- The Action Alternative meets the purpose and need of this project as listed in the beginning of this EA.
- The proposed project supports the goals and objectives of the Western States Wildland Urban Interface Grant Program administered by DNRC.
- The Action Alternative, provides financial assistance to reduce wildfire risks, improve the health and resiliency of forest ecosystems where public and private forest meet.
- The proposed project supports the goals and objectives of the Montana Forest Action Plan and the Tri-County Community Wildfire Protection Plan.
- The Action Alternative is consistent with Federal, State, and local policies, law and regulations.
- The Action Alternative include mitigation measures as identified by the DNRC and other project cooperators.

### Significance of Potential Impacts

Upon review of the proposed project and the EA, I find that none of the impacts are severe, enduring, frequent, or geographically widespread. Further, I find that the quantity and quality of the natural resources including any that may be considered unique or fragile, will not be adversely affected to a significant degree. I find no precedent for the future actions that would cause significant impacts, and I find no conflict with local, State, or Federal laws, requirements, or formal plans.

### Need for Further Environmental Analysis

☐

EIS

☐

More Detailed EA

☒

No Further Analysis

### Environmental Assessment Checklist Approved By:

**Name: Heidi Crum**

**Title: Helena Unit Manager**

**Date: 7/13/21**

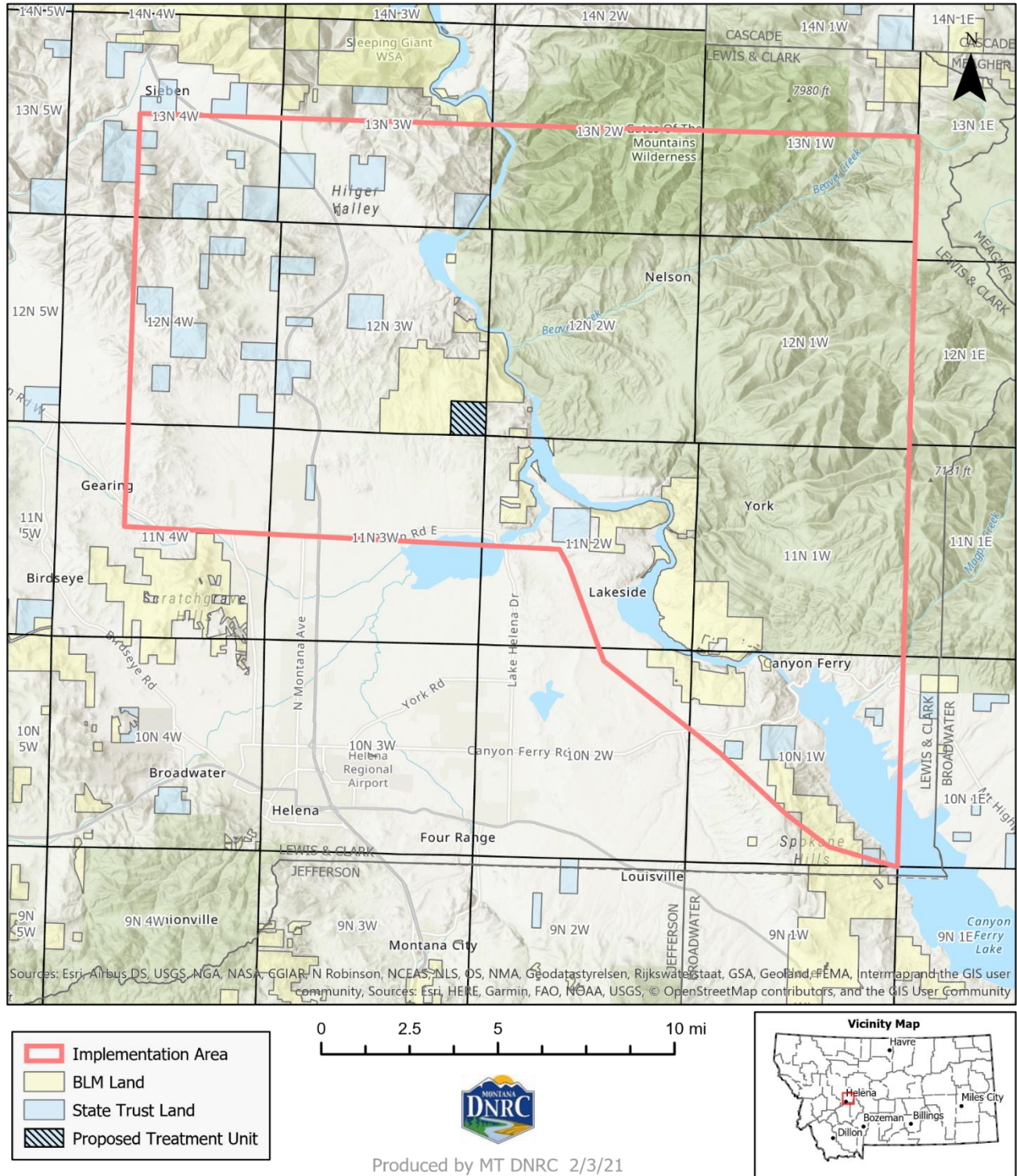


**Signature:**

## Appendix A - Maps

A-1:

### Proposed North Hills WUI Grant Implementation Area Lewis & Clark



A-2: Proposed North Hills WUI Grant State Trust Land Project Area  
Township 12N Range 3W Section 36

